

PRESERVATION OF RECORDS POLICY

Preamble:

The Securities and Exchange Board of India (SEBI) vide its notification issued on 2nd September, 2015 has notified SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations'). These Regulations have come in to force effective from 1st December 2015.

In terms of Regulation 9 of the said Regulations, listed companies are required to have a policy for preservation of documents approved by its Board of Directors, classifying them as documents whose preservation shall be permanent in nature and documents with preservation period of not less than eight years after completion of relevant transactions.

Accordingly the Board of Directors of Chowgule Steamships Limited has approved this policy for preservation of documents/ records maintained by the Company either in physical mode or electronic mode.

Purpose of the policy:

The purpose of this policy is to lay down a framework for effective management of the records of the Company and to ensure the preservation and protection of the records as per the statutory requirements. This policy is also meant to set principles underlying the Company's approach to preservation of its records and to define the obligation of the employees in retaining and preserving the records which are required to be maintained as per the applicable statutory and regulatory requirements.

Applicability:

This policy is applicable to all documents maintained in physical and electronic mode by the Company. Any document not covered under this policy will be preserved and maintained as per the respective laws and rules under which such documents is maintained.

Definitions:

"Act" means the **Companies Act, 2013 and Companies Act, 1956.**

"Preservation" is maintenance of documents, files and records in usable form and to prevent from being altered, damaged or destroyed.

"Records" means recording of information in any form including data in computer systems created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

"Company" means **Chowgule Steamships Limited.**

“Board of Directors” or “Board” means the Board of Directors of Chowgule Steamships Limited, as constituted from time to time.

“Policy” means policy on Preservation of records.

“Storage Options” means either *Online storage* which means records are kept on a server or hard drive and are immediately available for use over a network. This option is best for records that must be accessed frequently or *Offline storage*, which means Records are stored on removable media and must be manually retrieved. This option provides the slowest access and would be used for records that are only rarely needed.

“Listing Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Policy:

a) LEGISLATIVE FRAMEWORK AND STANDARDS

- Companies (Preservation and Disposal of Records) Rules, 1966
- Companies Act, 2013.
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

b) MAINTAINENCE OF RECORDS

- The content and essential characteristics of digital records must remain unchanged through preservation.
- Digital records can be maintained in forms such as emails, web pages or database records, plus scanned versions of paper records that have been digitized in business processes.
- Physical records to be maintained in books and files.
- All digital and physical records to be saved at the registered office of the Company and no physical records can be migrated without permission of Company Secretary.
- A reproduction of any original record on microfilm or on any other medium shall be certified by a Director or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.

c) DISPOSAL AND DESTRUCTION OF RECORDS

All records mentioned in **Annexure A** which are temporary in nature must be preserved for not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed.

However if any of the records mentioned in Annexure A has been preserved for eight years but is subject matter of any legal dispute or appeal or claim with authorities or with third parties, then the same shall be preserved till final disposal of such dispute, appeal or claim as the case may be.

All records mentioned in **Annexure B** need to be preserved by the Company permanently during the entire life of the Company.

Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.

The Company shall maintain a register as specified in Annexure C, wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.

d) DISCLOSURE:

This Policy will be communicated to all operational employees and other concerned persons of the Company and be disclosed on the Company's website www.chowgulesteamships.co.in.

Sr	Annexure A	Sr.	Annexure B
.	Proxy forms		Certificate of incorporation
	Representation letters		Certificate of change of name (if any)
	Annual reports		Common Seal
	Annual returns		Memorandum and Articles of Association as amended from time to time
	Consent and Resignation Letters received from the Directors		Counter folios of Share Certificates issued from time to time
	. Board Agenda and supporting Documents		Minutes Book
	Office Copies of Notice of General Meeting and related papers		Circular resolutions

